

1 THE HONORABLE DAVID G. ESTUDILLO
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 TOMMY BROWN, on his own behalf and on
10 behalf of other similarly situated persons,

11 Plaintiff,

12 v.

13 TRANSWORLD SYSTEMS, INC., *et al.*,

14 Defendants.

15 No. 2:20-cv-00680-DGE

16 STIPULATED MOTION AND
[PROPOSED] ORDER TO
CONTINUE DEADLINE TO FILE
PROPOSED SCHEDULE FOR
EVENTS RELATED TO CLASS
CERTIFICATION AND
DISPOSITIVE MOTIONS AND ESI
PROTOCOL

17 NOTE ON MOTION CALENDAR:

Monday, March 13, 2023

18 Pursuant to Western District of Washington Local Civil Rules 7(d)(1) and 10(g), and in a
19 cooperative effort to comply with this Court's February 24, 2023 directive to file a proposed
20 schedule for class certification and dispositive motion on loan ownership, and the ESI protocol,
21 and after meeting and conferring, Plaintiff Tommy Brown ("Plaintiff") and Defendants
22 Transworld Systems Inc. ("TSI"), Patenaude & Felix, APC ("P&F"), U.S. Bank National
23 Association ("U.S. Bank"), National Collegiate Student Loan Trust 2004-1, National Collegiate
24 Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate
25 Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate

26 STIPULATED MOTION AND [PROPOSED] ORDER TO
CONTINUE DEADLINE TO FILE PROPOSED SCHEDULE
AND ESI PROTOCOL (NO. 2:20-CV-00680-DGE) – 1

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1 Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate
 2 Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, “the
 3 Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), respectfully submit this
 4 stipulated motion to continue the deadline to file: (1) the proposed schedule for events relating to
 5 Plaintiff’s motion for class certification and initial, appropriate dispositive motions (including the
 6 Defendants’ desired motion on loan ownership), (2) a proposed ESI protocol, and (3) a proposed
 7 case management order. The parties propose the following continued deadline and conference
 8 date:

Event	Deadline
Submission of Proposed Schedule For Events Relating to Class Certification and Dispositive Motions, Proposed Case Management Order, and ESI Protocol	Thursday, March 30, 2023

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 14 The parties have entered this stipulation to accommodate the limited availability of parties
 15 and counsel, and to mutually cooperate in the management of this action and for the purpose of
 16 maximizing judicial economy and conserving the parties’ resources. The extension of the above
 17 deadlines does not alter or modify any other rights or responsibilities of the parties except as stated
 18 herein permitted by law or under the Federal Rules of Civil Procedure, the Local Civil Rules, or
 19 other prior orders of this Court.

20 DATED: March 13, 2023.
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STIPULATED MOTION AND [PROPOSED] ORDER TO
 CONTINUE DEADLINE TO FILE PROPOSED SCHEDULE
 AND ESI PROTOCOL (NO. 2:20-CV-00680-DGE) – 2

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13 Student Loan Trust 2005-1, National
14 Collegiate Student Loan Trust 2005-2,
National Collegiate Student Loan Trust 2005-
3, National Collegiate Student Loan Trust
2006-1, National Collegiate Student Loan
Trust 2006-2, National Collegiate Student
Loan Trust 2007-1, National Collegiate
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26 STIPULATED MOTION AND [PROPOSED] ORDER TO
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2 **[PROPOSED] ORDER**
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4 IT IS SO ORDERED:
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7 Based on the parties' representations, the schedule for filing the Proposed Schedule for
8 Class Certification and Dispositive Motions, Proposed Case Management Order, and ESI Protocol
9 is as follows:
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Event	Deadline
Submission of Proposed Schedule For Events Relating to Class Certification and Initial Dispositive Motions, Proposed Case Management Order, and ESI Protocol	Thursday, March 30, 2023

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12 DATED this ____ the day of March, 2022.
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15 _____
16 Honorable David G. Estudillo
17 United States District Judge
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STIPULATED MOTION AND [PROPOSED] ORDER TO
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